

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SEC,	:	
	:	Civil Action No. 16-1428 (WHW-CLW)
Plaintiff,	:	
	:	
v.	:	
	:	
RVPLUS, Inc	:	<u>INITIAL PRETRIAL SCHEDULING ORDER</u>
	:	
Defendants.	:	
_____	:	

THIS MATTER having come before the Court for a scheduling conference pursuant to Fed. R. Civ. P. 16 on **August 31, 2016**; and the parties having reviewed the Court's Civil Case Management Order as well as the Local Civil Rules, and for good cause shown,

IT IS on this 31 day of August, 2016,

ORDERED THAT: The Court will hold a telephone conference, to be initiated by plaintiff, on 12/8/16 at 2:30 PM. Parties may contact chambers at (973) 776 7862

FURTHER ORDERED that this matter will proceed as follows:

I. DISCOVERY AND MOTION PRACTICE

1. **Fact Discovery Deadline.** Fact discovery is to remain open through **8/31/17**. All fact witness depositions must be completed by the close of fact discovery. No discovery is to be issued or engaged in beyond that date, except upon application and for good cause shown.
2. **Motions to Add New Parties.** Any motion to add new parties, whether by amended or third-party complaint, must be electronically filed no later than **10/31/16**.
3. **Motions to Amend Pleadings.** Any motion to amend pleadings must be electronically filed no later than **10/31/16**.
4. **Rule 26 Disclosures.** The parties shall exchange disclosures as required pursuant to Fed. R. Civ. P. 26 no later than **10/3/16**.

5. **Interrogatories.** The parties may serve interrogatories limited to **ten (10)** single questions including subparts, on or before **9/30/16**, which shall be responded to by **10/31/16**.
6. **Document Requests:** The parties may serve requests for production of documents on or before **9/30/16**, which shall be responded to by **10/31/16**.
7. **Depositions.** The number of depositions to be taken by each side shall not exceed **(15)**. Consistent with Rule 32, objections to questions posed at depositions shall be made other than as to lack of foundation, form, or privilege.
8. **Electronic Discovery.** The parties are directed to Rule 26(f), as amended, which, *inter alia*, addresses preservation of discoverable information, discovery of electronically stored information, and claims of privilege or work product protection. The parties are also directed to Local Civil Rule 26.1(d) which describes the obligations of counsel with regard to their clients' information management systems.
9. **Discovery Disputes.** Please refer to the Court's Civil Case Management Order.
10. **Motion Practice.** Please refer to the Court's Civil Case Management Order.
11. **Affirmative Expert Reports.** All affirmative expert reports shall be delivered by **10/26/17** .
12. **Responding Expert Reports.** All responding expert reports shall be delivered by **12/7/17**. **Depositions of all experts to be completed by 2/15/18**
13. **Form and Content of Expert Reports.** All expert reports must comport with the form and content requirements set forth in Rule 26(a)(2)(B). No expert shall testify at trial as to any opinions or base those opinions on facts not substantially disclosed in the expert's report.
14. **Extensions and Adjournments.** Please refer to the Court's Civil Case Management Order.
15. **Protective Orders.** Please refer to the Court's Civil Case Management Order.
16. **Local Rules.** Please refer to the Court's Civil Case Management Order.
17. **FAILURE TO COMPLY WITH THE TERMS OF THIS ORDER OR ANY OTHER ORDERS WILL RESULT IN SANCTIONS.**

SO ORDERED

s/ Cathy L. Waldor

CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE